

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MINNESOTA**

In re: Baycol Products Litigation

UNITED STATES OF AMERICA *ex rel.*
LAURIE SIMPSON,

Honorable Michael J. Davis
United States District Court Judge

Honorable Elizabeth Cowan Wright
United States Magistrate Judge

Plaintiff,

v.

BAYER HEALTHCARE
PHARMACEUTICALS, INC.;
BAYER CORP.; and
BAYER A.G.,

MDL No. 1431
Civil No. 08-5758-MJD-ECW

Defendants.

**STIPULATED REQUEST FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANTS' MOTION TO QUASH**

Plaintiff-Relator Laurie Simpson ("Relator") and Defendants Bayer Corp. and
Bayer A.G. (collectively "Defendants"), hereby stipulate and agree as follows:

WHEREAS, on December 22, 2020 Defendants filed a Motion to Quash Relator's
Deposition Subpoenas (ECF No. 238) ("Motion");

WHEREAS, the Motion is noticed for hearing at 1:00 PM CST on January 29,
2021;

WHEREAS, Local Rule 7.1(b)(2) provides that Relator shall respond to the Motion within seven (7) days (i.e., by December 29, 2020);

WHEREAS, the Motion is 18 pages long, and raises numerous issues of fact and law;

WHEREAS, in light of the length of the Motion, intervening Holidays, existing litigation schedules, and COVID-19-related logistical challenges due to ongoing offices closures, Relator requests a modest extension to respond to the Motion;

WHEREAS, the parties have met and conferred and Defendants consent to the extension sought by Relator;

WHEREAS, Defendants intend to seek leave to file a Reply Brief in support of Defendants' Motion to Quash following Relator's opposition;

NOW, THEREFORE, the Parties hereby stipulate and agree and respectfully request that the Court enter an Order as follows:

1. The time for Relator to respond to Defendants' Motion shall be extended until January 15, 2021.
2. The time for Defendants to file a request for leave to file a Reply and proposed Reply Brief shall be January 22, 2021.

Dated: December 23, 2020

Respectfully submitted,

KESSLER TOPAZ
MELTZER & CHECK LLP
/s/ Asher Alavi

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Respectfully submitted,

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Corporation, Bayer AG, and
Bayer Healthcare Pharmaceuticals,
Inc.*

CERTIFICATE OF SERVICE

I certify that on December 23, 2020, the foregoing document was served this day on all counsel of record via CM/ECF.

/s/ Asher Alavi